IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

AMDOCS (ISRAEL) LIMITED, an Israeli Corporation,
 	
                 Plaintiff,
 	
     v.
 	
OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation,
 	
               Defendants.
	Case No. 1:10-CV-910 (LMB/TRJ)
	
	JURY TRIAL DEMANDED

DECLARATION OF PATRICK McDANIEL

I, Patrick McDaniel, hereby declare as follows:

1. I am submitting this declaration in support of Openet's Opposition to Amdocs' Motion for Proposed Claim Constructions and Partial Summary Judgment of No Invalidity and No Inequitable Conduct. I have been retained on behalf of Openet as a technical expert. I have submitted expert reports on the invalidity and non-infringement of the patents-in-suit, and I was deposed by counsel for Amdocs in May 2011.

2. By way of background, I am Professor of Computer Science and Engineering at The Pennsylvania State University. Before joining the Penn State faculty I worked at AT&T Research in Florham Park, New Jersey. Early in my career I worked as a developer for a small software company that provided network management software to telecommunications companies such as MCI, AT&T, and McCaw Cellular. I hold a Ph.D. in Computer Science from the University of Michigan.

3. I disagree with Amdocs' assertion that the telephony call detail record (CDR) billing process was relatively simple. Whether done of over circuit-switched

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networks or packet-switched networks, mediating network records to generate a bill is and has been one of the most complex tasks in the field of network management. Generating a bill requires processing records from the different services (e.g., voice, data) and other value added services (e.g., voicemail, email, video) provided over telecommunications networks. That was the case when the patents-in-suit were filed and remains the case today.
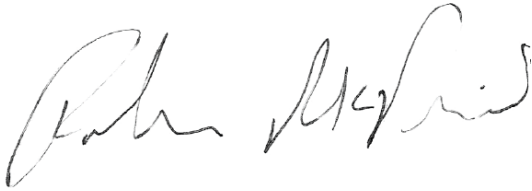
4. Also, mediating data records generated in circuit-switched networks is not fundamentally different than mediating data records generated in packet-based networks. In circuit-switched networks the data records typically represent the length of an event (e.g., length of phone call, length of data transmission), while in packet-based networks the data records typically represent the quantity of data transferred (e.g., an event lasting X minutes transmitted Y data packets, each consisting of Z data bytes). For a mediation system, however, both records are data (i.e., numeric quantities) that needs processed.

5. With respect to the claim term report, although reports can be generated by information retrieved from databases using queries, there are many ways to generate reports, including but not limited to queries to a database.

6. With respect to the claim term "plurality of layers," although the Open Systems Interconnection (OSI) model referenced in the patents-in-suit is a common networking model and contains multiple layers, there are other networking models that may differ from or not adhere to the OSI model.

I declare, subject to the penalty of perjury of the laws of the United States of America, that the foregoing is to the best of my knowledge true and correct.

Date: June 16, 2011

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Patrick McDaniel